



750 Third Avenue  
New York, NY 10017-2703  
(212) 687-8181  
Fax: (212) 972-9432  
www.kreindler.com

September 14, 2018

VIA ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *In re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
This document relates to: *Ashton, et al. v. al Qaeda Islamic Army, et al.*,  
02-cv-6977(GBD)(SN)

Dear Judge Daniels,

On July 19, 2018, our office filed a Motion for Final Judgments on behalf of twenty-five of the *Ashton* plaintiffs listed in Exhibit A attached to the Kreindler Declaration (referred to therein as the “*Ashton V*” claimants). See ECF Doc. Nos 4058-4060. On September 13, 2018, the Court issued its Order on the July 19, 2018 Motion. See Doc. No. 4173. In that Order, the Court directed plaintiffs to submit a signed declaration of Nissa Youngren to the Court within two weeks, as a duplicate of her brother’s declaration was inadvertently included as an exhibit to the plaintiffs’ motion in place of hers. In response to the Court’s September 13, 2018 Order, plaintiffs now ask for leave to file the signed declaration by Nissa Youngren in which she affirms the facts that were previously articulated in the plaintiffs’ July 19, 2018 memorandum of law, attached hereto as Exhibit A.

Thank you for your consideration of this matter.

Respectfully,

KREINDLER & KREINDLER LLP

/s/ James P. Kreindler

James P. Kreindler, Esq.  
Andrew J. Maloney III, Esq.  
750 Third Avenue, 32nd Floor

**California Office**

707 Wilshire Boulevard, Los Angeles, CA 90017-3613  
Tel: (213) 622-6469 Fax: (213) 622-6019

**Massachusetts Office**

855 Boylston Street, Boston, MA 02116-2688  
Tel: (617) 424-9100 Fax: (617) 424-9120

September 14, 2018

Page 2

New York, New York 10017  
Tel: (212) 687-8181  
Fax: (212) 972 – 9432  
Email: [amaloney@kreindler.com](mailto:amaloney@kreindler.com)  
*Attorneys for Ashton Plaintiffs*

Enclosure

cc: All MDL Counsel of Record (via ECF)